

## LPDES PERMIT NO. LA0046558, AI No. 1647

**REVISED LPDES STATEMENT OF BASIS**  
**FOR THE DRAFT LOUISIANA POLLUTANT DISCHARGE ELIMINATION SYSTEM**  
**(LPDES) PERMIT TO DISCHARGE TO WATERS OF LOUISIANA**

- I. **Company/Facility Name:** Boise Building Solutions Manufacturing, LLC  
Florien Plywood Plant  
225 Studeman Street  
Florien, Louisiana 71429
- II. **Issuing Office:** Louisiana Department of Environmental Quality  
(LDEQ)  
Office of Environmental Services  
Post Office Box 4313  
Baton Rouge, Louisiana 70821-4313
- III. **Prepared By:** Sonja Loyd  
Industrial Permits Section  
Water Permits Division  
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**Date Prepared:** September 15, 2009, revised March 8, 2010

IV. **Permit Action/Status:**

A. **Reason For Permit Action:**

Proposed reissuance of an expired Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term following regulations promulgated at LAC 33:IX.2711/40 CFR 122.46.

LAC 33:IX Citations: Unless otherwise stated, citations to LAC 33:IX refer to promulgated regulations listed at Louisiana Administrative Code, Title 33, Part IX.

40 CFR Citations: Unless otherwise stated, citations to 40 CFR refer to promulgated regulations listed at Title 40, Code of Federal Regulations in accordance with the dates specified at LAC 33:IX.2301, 4901, and 4903.

- B. **LPDES permit -** LPDES permit effective date: June 1, 2004  
LPDES permit modification date: December 1, 2004  
LPDES permit expiration date: May 31, 2009  
EPA has not retained enforcement authority.
- C. **Application received on December 2, 2008 with additional information received via e-mail correspondence on October 30, 2009 and March 3, 2010.**

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**V. Facility Information:**

A. Location - 225 Studeman Street in Florien, Sabine Parish  
 (Latitude 31°27'22", Longitude 93°27'39").

B. Applicant Activity - According to the application, Boise Building Solutions Manufacturing, LLC, Florien Plywood Plant, is an existing plywood plant.

During the public notice period, the permittee submitted comments (dated January 18, 2010) on the initial draft permit package (dated December 8, 2009). This draft permit package will be re-public noticed since it has been revised to include additional miscellaneous wastewaters as requested by the permittee. See Section VIII.E of the Revised Statement of Basis.

C. Technology Basis - (40 CFR Chapter 1, Subchapter N/Parts 401, 405-415, and 417-471 have been adopted by reference at LAC 33:IX.4903)

Guideline

Reference

Barking

40 CFR 429, Subpart A (\*1)

Sawmills and Planing Mills

40 CFR 429, Subpart I (\*1)

Wet Storage

40 CFR 429, Subpart K (\*1)

(\*1) According to the effluent guidelines, no process wastewater pollutants shall be discharged into navigable waters. The term "process wastewater" specifically excludes utility wastewater types under the general provisions cited at 40 CFR 429.11(c).

Other sources of technology based limits:

Current LPDES permit (effective June 1, 2004)

Best Professional Judgement

D. Fee Rate -

1. Fee Rating Facility Type: Minor
2. Complexity Type: IV
3. Wastewater Type: III
4. SIC code: 2436

**VI. Receiving Waters:**

STREAM - Midkiff Creek via an unnamed ditch

BASIN AND SUBSEGMENT - Sabine River Basin, Subsegment No. 110401

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DESIGNATED USES - a. primary contact recreation  
b. secondary contact recreation  
c. fish and wildlife propagation

VII. Outfall Information:

Outfall 001

- A. Type of wastewater - stormwater runoff; log spray pond overflow; once-through non-contact cooling water; boiler blowdown; boiler condensate; recycled equipment washwater; boiler water treatment system backwash; discharges from fire fighting activities; fire hydrant flushings; potable water including water line flushings using potable water; uncontaminated air conditioning or compressor condensates; irrigation drainage; landscape watering provided that all pesticides, herbicides, and fertilizers have been applied in accordance with the manufacturer's instructions; pavement wash waters where no detergents are used and no spills or leaks of toxic or hazardous materials have occurred (unless all spilled material has been removed); routine external building washdown which does not use detergents; uncontaminated groundwater or spring water, discharges from foundation or footing drains where flows are not contaminated with process materials such as solvents; and incidental windblown mist from cooling towers that collects on rooftops or adjacent portions of the facility
- B. Location - at the point of discharge from the effluent flow measuring structure prior to combining with other waters at Latitude 31°27'05", Longitude 93°27'44".
- C. Treatment - settling, filtration, oil/water separation, and screening
- D. Flow - Continuous, 0.37 MGD (Long Term Average)
- E. Receiving waters - Midkiff Creek via an unnamed ditch
- F. Basin and subsegment - Sabine River Basin, Subsegment No. 110401

Outfall 002

- A. Type of wastewater - stormwater runoff (from Plant Area #1); log spray pond overflow; discharges from fire fighting activities; fire hydrant flushings; potable water including water line flushings using potable water; uncontaminated air conditioning or compressor condensates; irrigation drainage; landscape watering provided that all pesticides, herbicides, and fertilizers have been applied in accordance with the manufacturer's instructions; pavement wash

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waters where no detergents are used and no spills or leaks of toxic or hazardous materials have occurred (unless all spilled material has been removed); routine external building washdown which does not use detergents; uncontaminated groundwater or spring water, discharges from foundation or footing drains where flows are not contaminated with process materials such as solvents; and incidental windblown mist from cooling towers that collects on rooftops or adjacent portions of the facility

- B. Location - at the point of discharge from the culvert near the northeast corner of the site prior to combining with other waters at Latitude 31°27'25", Longitude 93°27'42".
- C. Treatment - oil/water separation, settling, and screening
- D. Flow - Intermittent, 0.05 MGD (Long Term Average)
- E. Receiving waters - Midkiff Creek via an unnamed ditch
- F. Basin and subsegment - Sabine River Basin, Subsegment No. 110401

Outfall 003

- A. Type of wastewater - stormwater runoff (from the entrance road area); discharges from fire fighting activities; fire hydrant flushings; potable water including water line flushings using potable water; uncontaminated air conditioning or compressor condensates; irrigation drainage; landscape watering provided that all pesticides, herbicides, and fertilizers have been applied in accordance with the manufacturer's instructions; pavement wash waters where no detergents are used and no spills or leaks of toxic or hazardous materials have occurred (unless all spilled material has been removed); routine external building washdown which does not use detergents; uncontaminated groundwater or spring water, discharges from foundation or footing drains where flows are not contaminated with process materials such as solvents; and incidental windblown mist from cooling towers that collects on rooftops or adjacent portions of the facility
- B. Location - at the point of discharge to the ditch at the entrance road prior to combining with other waters at Latitude 31°27'22", Longitude 93°27'39".
- C. Treatment - screening
- D. Flow - Intermittent, 0.023 MGD (Long Term Average)
- E. Receiving waters - Midkiff Creek via an unnamed ditch

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F. Basin and subsegment - Sabine River Basin, Subsegment No. 110401

Outfall 004

- A. Type of wastewater - stormwater runoff (from the area east of the main production building); discharges from fire fighting activities; fire hydrant flushings; potable water including water line flushings using potable water; uncontaminated air conditioning or compressor condensates; irrigation drainage; landscape watering provided that all pesticides, herbicides, and fertilizers have been applied in accordance with the manufacturer's instructions; pavement wash waters where no detergents are used and no spills or leaks of toxic or hazardous materials have occurred (unless all spilled material has been removed); routine external building washdown which does not use detergents; uncontaminated groundwater or spring water, discharges from foundation or footing drains where flows are not contaminated with process materials such as solvents; and incidental windblown mist from cooling towers that collects on rooftops or adjacent portions of the facility
- B. Location - at the point of discharge to the north-south ditch southeast of the main production building prior to combining with other waters at Latitude 31°27'10", Longitude 93°27'38"
- C. Treatment - none
- D. Flow - Intermittent, 0.025 MGD (Long Term Average)
- E. Receiving waters - Midkiff Creek via an unnamed ditch
- F. Basin and subsegment - Sabine River Basin, Subsegment No. 110401

**VIII. Proposed Permit Limits:**

Summary of Proposed Changes From the Current LPDES Permit:

A. Outfall 001

The sample type for flow will be changed from an estimate to a measure based on additional information received via e-mail which indicated that the flow is monitored continuously using a flowmeter and a "V" notch weir.

B. Outfalls 003 and 004

The monitoring frequency for flow was inadvertently listed as 1/month instead of 1/3 months in the current permit. The monitoring

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frequency has been changed to reflect 1/3 months in the draft permit.

- C. A provision will be added in Part II.H which requires the permittee to submit analytical data for Outfalls 001, 002, 003, and 004 as required by the Water Quality Regulations in accordance with Section III.B.4 of the IND Application. The permittee will not need to re-submit analytical data that was provided in the 2008 Application. This provision will require the facility to submit analytical data for these outfalls within one (1) year after the effective date of the permit. Upon submittal of the analytical data, the LDEQ may choose to modify this permit to change the effluent limits based on this information.
- D. The provision in the Part II conditions that required submittal of DMRs to the appropriate LDEQ Regional Office will be removed from the permit since all DMRs sent to the Office of Environmental Compliance/Permit Compliance Unit are now scanned into Electronic Document Management System (EDMS) which is accessible to all LDEQ personnel.
- E. The permittee submitted an e-mail correspondence (dated March 3, 2010) which requested that the draft permit package be revised to include "the allowable non-stormwater discharges referenced in Section 1.2.2.2 of LPDES Multi-Sector General Permit for Storm Water Discharges Associated with Industrial Activities, Permit No. LAR050000" in the outfall descriptions for Outfalls 001, 002, 003, and 004. This Office has decided to grant this request. The wastestreams that will be added to each outfall include the following miscellaneous wastewaters: discharges from fire fighting activities; fire hydrant flushings; potable water including water line flushings using potable water; uncontaminated air conditioning or compressor condensates; irrigation drainage; landscape watering provided that all pesticides, herbicides, and fertilizers have been applied in accordance with the manufacturer's instructions; pavement wash waters where no detergents are used and no spills or leaks of toxic or hazardous materials have occurred (unless all spilled material has been removed); routine external building washdown which does not use detergents; uncontaminated groundwater or spring water, discharges from foundation or footing drains where flows are not contaminated with process materials such as solvents; and incidental windblown mist from cooling towers that collects on rooftops or adjacent portions of the facility.

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**IX. Permit Limit Rationale:**

The following section sets forth the principal facts and the significant factual, legal, methodological, and policy questions considered in preparing the draft permit.

1. Outfall 001 - stormwater runoff; log spray pond overflow; once-through non-contact cooling water; boiler blowdown; boiler condensate; recycled equipment washwater; boiler water treatment system backwash; discharges from fire fighting activities; fire hydrant flushings; potable water including water line flushings using potable water; uncontaminated air conditioning or compressor condensates; irrigation drainage; landscape watering provided that all pesticides, herbicides, and fertilizers have been applied in accordance with the manufacturer's instructions; pavement wash waters where no detergents are used and no spills or leaks of toxic or hazardous materials have occurred (unless all spilled material has been removed); routine external building washdown which does not use detergents; uncontaminated groundwater or spring water, discharges from foundation or footing drains where flows are not contaminated with process materials such as solvents; and incidental windblown mist from cooling towers that collects on rooftops or adjacent portions of the facility

PARAMETER(S)	MASS, LBS/DAY unless otherwise stated		CONCENTRATION, MG/L unless otherwise stated		MEASUREMENT FREQUENCY
	MONTHLY AVERAGE	DAILY MAXIMUM	MONTHLY AVERAGE	DAILY MAXIMUM	
Flow, MGD	Report	Report	---	---	1/month
COD	---	---	---	200	1/month
Oil and Grease	---	---	---	15	1/month
pH (Standard Units)	---	---	6.0 (Min)	9.0 (Max)	1/month

**Site-Specific Consideration(s)**

Flow - monitoring requirements are established in accordance with LAC 33:IX.2707.I.1.b and the previous permits.

COD and Oil and Grease - limits are established by BPJ based on the previous permits.

pH - limits are established in accordance with LAC 33:IX.1113.C.1 and the previous permits.

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2. Outfall 002 - stormwater runoff (from Plant Area #1); log spray pond overflow; discharges from fire fighting activities; fire hydrant flushings; potable water including water line flushings using potable water; uncontaminated air conditioning or compressor condensates; irrigation drainage; landscape watering provided that all pesticides, herbicides, and fertilizers have been applied in accordance with the manufacturer's instructions; pavement wash waters where no detergents are used and no spills or leaks of toxic or hazardous materials have occurred (unless all spilled material has been removed); routine external building washdown which does not use detergents; uncontaminated groundwater or spring water, discharges from foundation or footing drains where flows are not contaminated with process materials such as solvents; and incidental windblown mist from cooling towers that collects on rooftops or adjacent portions of the facility

PARAMETER(S)	MASS, LBS/DAY unless otherwise stated		CONCENTRATION, MG/L unless otherwise stated		MEASUREMENT FREQUENCY (*1)
	MONTHLY AVERAGE	DAILY MAXIMUM	MONTHLY AVERAGE	DAILY MAXIMUM	
Flow, MGD	Report	Report	---	---	1/month
COD	---	---	---	200	1/month
Oil and Grease	---	---	---	15	1/month
pH (Standard Units)	---	---	6.0 (Min)	9.0 (Max)	1/month

(\*1) When discharging.

#### Site-Specific Consideration(s)

Flow - monitoring requirements are established in accordance with LAC 33:IX.2707.1.1.b and the previous permits.

COD and Oil and Grease - limits are established by BPJ based on the previous permits.

pH - limits are established in accordance with LAC 33:IX.1113.C.1 and the previous permits.

3. Outfall 003 - stormwater runoff (from the entrance road area); discharges from fire fighting activities; fire hydrant flushings; potable water including water line flushings using potable water; uncontaminated air conditioning or compressor condensates; irrigation drainage; landscape watering provided that all pesticides, herbicides, and fertilizers have been applied in accordance with the manufacturer's instructions; pavement



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wash waters where no detergents are used and no spills or leaks of toxic or hazardous materials have occurred (unless all spilled material has been removed); routine external building washdown which does not use detergents; uncontaminated groundwater or spring water, discharges from foundation or footing drains where flows are not contaminated with process materials such as solvents; and incidental windblown mist from cooling towers that collects on rooftops or adjacent portions of the facility

PARAMETER(S)	MASS, LBS/DAY unless otherwise stated		CONCENTRATION, MG/L unless otherwise stated		MEASUREMENT FREQUENCY (*1)
	MONTHLY AVERAGE	DAILY MAXIMUM	MONTHLY AVERAGE	DAILY MAXIMUM	
Flow, MGD	Report	Report	---	---	1/3 months
COD	---	---	---	Report (*2)	1/6 months
Oil and Grease	---	---	---	15	1/3 months
pH (Standard Units)	---	---	6.0 (Min)	9.0 (Max)	1/3 months

(\*1) When discharging.

(\*2) The daily maximum of 250 mg/L will be used as an action level requiring further response as described in Section IX of this Statement of Basis for pollution prevention practices to be instituted by the facility to reduce any potential degradation to the receiving stream due to high COD levels

Site-Specific Consideration(s)

Flow - monitoring requirements are established in accordance with LAC 33:IX.2707.I.1.b and the previous permits.

COD - monitoring requirement is established by BPJ based on the previous permits.

Oil and Grease - limit is established by BPJ based on the previous permits.

pH - limits are established in accordance with LAC 33:IX.1113.C.1 and the previous permits.

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4. Outfall 004 - stormwater runoff (from the area east of the main production building); discharges from fire fighting activities; fire hydrant flushings; potable water including water line flushings using potable water; uncontaminated air conditioning or compressor condensates; irrigation drainage; landscape watering provided that all pesticides, herbicides, and fertilizers have been applied in accordance with the manufacturer's instructions; pavement wash waters where no detergents are used and no spills or leaks of toxic or hazardous materials have occurred (unless all spilled material has been removed); routine external building washdown which does not use detergents; uncontaminated groundwater or spring water, discharges from foundation or footing drains where flows are not contaminated with process materials such as solvents; and incidental windblown mist from cooling towers that collects on rooftops or adjacent portions of the facility

PARAMETER(S)	MASS, LBS/DAY unless otherwise stated		CONCENTRATION, MG/L unless otherwise stated		MEASUREMENT FREQUENCY (*1)
	MONTHLY AVERAGE	DAILY MAXIMUM	MONTHLY AVERAGE	DAILY MAXIMUM	
Flow, MGD	Report	Report	---	---	1/3 months
COD	---	---	---	Report (*2)	1/6 months
Oil and Grease	---	---	---	15	1/3 months
pH (Standard Units)	---	---	6.0 (Min)	9.0 (Max)	1/3 months

(\*1) When discharging.

(\*2) The daily maximum of 250 mg/L will be used as an action level requiring further response as described in Section IX of this Statement of Basis for pollution prevention practices to be instituted by the facility to reduce any potential degradation to the receiving stream due to high COD levels

Site-Specific Consideration(s)

Flow - monitoring requirements are established in accordance with LAC 33:IX.2707.I.1.b and the previous permits.

COD - monitoring requirement is established by BPJ based on the previous permits.

Oil and Grease - limit is established by BPJ based on the previous permits.

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pH - limits are established in accordance with LAC 33:IX.1113.C.1 and the previous permits.

#### STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENTS

In accordance with LAC 33:IX.2707.I.3 and 4 [40 CFR 122.44(I)(3) and (4)], a Part II condition is proposed for applicability to all storm water discharges from the facility, either through permitted outfalls or through outfalls which are not listed in the permit or as sheet flow. **For first time permit issuance**, the Part II condition requires a Storm Water Pollution Prevention Plan (SWP3) within six (6) months of the effective date of the final permit. **For renewal permit issuance**, the Part II condition requires that the Storm Water Pollution Prevention Plan (SWP3) be reviewed and updated, if necessary, within six (6) months of the effective date of the final permit. If the permittee maintains other plans that contain duplicative information, those plans could be incorporated by reference to the SWP3. Examples of these type plans include, but are not limited to: Spill Prevention Control and Countermeasures Plan (SPCC), Best Management Plan (BMP), Response Plans, etc. The conditions will be found in the draft permit. Including Best Management Practice (BMP) controls in the form of a SWP3 is consistent with other LPDES and EPA permits regulating similar discharges of stormwater associated with industrial activity, as defined in LAC 33:IX.2522.B.14 [40 CFR 122.26(b)(14)].

#### COD Action Level

Any exceedance of the COD action level at Outfalls 003 or 004 shall result in the following requirements:

1. The sampling frequency for COD shall increase from 1/6 months to 1/3 months. This increased sampling frequency shall continue until a sample demonstrates compliance with the 250 mg/L COD action level at which time the monitoring frequency shall return to 1/6 months.
2. A written status report describing the actions taken to ensure reductions in exceedances of the COD action level shall be submitted to the LDEQ with the quarterly DMR reports.
3. The SWP3 plan shall be updated to incorporate the actions described in Section (2) above.

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#### **TMDL Waterbodies**

Subsegment No. 110401 of the Sabine River Basin is not listed on the 2006 Final Integrated 303(d) List as impaired since the all of the Total Maximum Daily Loading (TMDL) assessments have been completed for this subsegment. The pollutants of concern were Fecal Coliform and Organic Enrichment/Low Dissolved Oxygen (DO).

#### Organic Enrichment/low DO

The TMDL for Dissolved Oxygen for Bayou Toro was finalized on April 2, 2008. Based on the results of this TMDL assessment, this point source discharger was located far enough upstream of the confluence of Midkiff Creek and Bayou Toro that the DO concentrations in Bayou Toro are not influenced by this discharger. Therefore, the proposed limits and/or monitoring requirements for COD will be consistent with the previous permits.

#### Fecal Coliform

The TMDLs for Fecal Coliform Bacteria for Selected Subsegments in the Sabine River Basin were finalized on April 2, 2008. Based on a review of this facility's application and current permit, there are no discharges of sanitary wastewater from this facility. Based on additional information received via e-mail correspondence, all sanitary wastewater discharges are sent to the Town of Florien's wastewater treatment system. Therefore, no limits for fecal coliform will be established in the permit.

#### **X. Compliance History/DMR Review:**

- A. LDEQ records were reviewed for the period of September 2007 through September 2009. There are no open enforcement actions listed for this facility under any media during this time period.
- B. A DMR review of the monitoring reports for the period of July 2007 through June 2009 revealed the following effluent excursion:

DATE	PARAMETER	OUTFALL	REPORTED VALUE	PERMIT LIMITS
12/07	pH	002	4.9 su	6.0 su (Min)

- C. The most recent inspection was conducted on August 6, 2006. There were no areas of concern noted in the inspection report.

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**XI. Endangered Species:**

The receiving waterbody, Subsegment No. 110401 of the Sabine River Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated November 17, 2008 from Rieck (FWS) to Nolan (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

**XII. Historic Sites:**

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

**XIII. Tentative Determination:**

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in the application.

**XIV. Public Notices:**

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List